

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHLOÉ, S.A.S., J. CHOO LIMITED	X
Plaintiffs,	:
- against -	:
KEN CHEN a/k/a SHU CHEN a/k/a XIANG CHEN, DANIEL DOE, GODDESS TRADING d/b/a GODDESSTRADING@HOTMAIL.COM, LUXUNG GOODS, LUXURY GOODS, TERRY DOE d/b/a AZNTERRY911@HOTMAIL.COM, JASON DOE d/b/a JARRY326@YAHOO.COM.CN, FASHION HANDBAGS, BENNY DOE a/k/a YU LIN, JEANCARLO DOE, JOSEPH a/k/a JOSE DOE a/k/a JOSE CHONG WEN, SISI a/k/a CECI DOE, TOP LUXURY HANDBAGS d/b/a LUXURYHANDBAGS277@YAHOO.COM, FRANCISCO DOE, BEN DOE, CARLOS DOE a/k/a CARLOS RENE TSE SIO, INSTYLE LUXURY HANDBAGS, LIN LIN NAN a/k/a CORINA DOE a/k/a QIMIAO HU a/k/a QI MIAO HU, KENNY DOE a/k/a YE GUO a/k/a GUO Q YE, NEWCOME TRADING d/b/a TOSCA, QUICK GLOBAL SHIPPING, HOWARD EXPRESS SHIPPING, RANDY DOE, JAE MAN YOO, YAN HE XIA, WAI KIT WONG, CHEN LI YU, CHEN X. JIANG, W. FEI ZENG, CHENG CHEN, XIANXN CAI, FU ALEJANDRO CHANG, WAI KIT LEW, ENYI HUANG, YUE XU, SONG GAO, LISA WU, JIMMY NG, TUAN PHAN, LING CAI, LISA CHAN YAN FEN CHEN, P.S.K. AMERICA, INC., HENG FA INC., CHEN STAR GIFT SHOP, JOEY'S GIFT SHOP, INC., CATSE CO., INC., SHEN XING GIFT SHOP INC., NEW WEALTH TRADING, INC. d/b/a TOSCA USA, TOSCA HANDBAGS, NICE HANDBAGS, 265 CANAL BOOTH #16, 265 CANAL BOOTH #5, 265 CANAL BOOTH #4, 277 CANAL ADJACENT H-3D, 421A BROADWAY, and various JOHN and JANE DOES and XYZ COMPANIES (UNIDENTIFIED),	:
Defendants.	:

X

PLEASE TAKE NOTICE that Plaintiffs CHLOÉ, S.A.S., ("Chloé") and J. CHOO, LIMITED ("Jimmy Choo") (collectively, "Plaintiffs") will and hereby do move before the Honorable Judge Pauley, of this Court for Entry of Default Judgment and Permanent Injunction Against Defendants Luxung Goods, Randy Doe, Francisco Doe, W. Fei Zeng, Heng Fa Inc., Nice Handbags, 265 Canal Booth #4, 421A Broadway, Benny Doe a/k/a Denny Doe a/k/a Yu Lin (collectively, "Defaulting Defendants") and for Statutory Damages, Against Defendant Benny Doe a/k/a Denny Doe a/k/a Yu Lin.

This Motion is made pursuant to Fed. R. Civ. Pr. 55 on the basis that the Defaulting Defendants have not answered or otherwise appeared to defend themselves and a Certificate of Default has been entered by the Clerk of Court. Thus it is appropriate for final judgment to be entered against all Defaulting Defendants, including a permanent injunction. Further, Plaintiffs seek an award of statutory damages against one Defaulting Defendant, based on the records before the Court.

Plaintiffs' Motion is based on this Notice of Motion, the accompanying Memorandum of Law, the Affidavit of Julie Bookbinder and the exhibits attached thereto, oral argument, if any, and all materials in the Court's file.

Dated: August 1, 2008

Respectfully submitted,
GREENBERG TRAURIG, LLP

By: /s/ Katherine Compton
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Scott Gelin (SG 9599)
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-and-

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Attorneys for Plaintiffs
Chloé, S.A.S., J. Choo Limited

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was caused to be served by First Class Mail upon the parties set forth below in accordance with Rule 5, Federal Rules of Civil Procedure on August 1, 2008:

421A Broadway
New York, NY 10013-2519
c/o Jimmy Ng

W. Fei Zeng
Booths 2 & 3
265 Canal St.
New York, NY 10013-6010

Luxung Goods
277 Canal Street H-2-C
New York, NY 10013

265 Canal Street Booth #4
New York, NY 10013

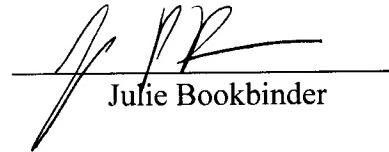
Nice Handbags
Booth #11
265 Canal St.
New York, NY 10013-6010

Heng Fa Inc.
Booths 2 & 3
265 Canal St.
New York, NY 10013-6010

Benny Doe a/k/a Denny Doe a/k/a
Yu Lin
89 Crosby Street
New York, New York 10013

Francisco Doe
277 Canal Street, H-3-D
New York, New York 10013

Randy Doe
421A Broadway
New York, New York 10013



Julie Bookbinder